

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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EXOSOME DIAGNOSTICS, INC.	:	No.
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
EREZ EITAN and NEURODEX, INC.	:	
	:	
Defendants.	:	
-----	X	

**PLAINTIFF EXOSOME DIAGNOSTICS, INC.’S MOTION TO IMPOUND
COMPLAINT AND MEMORANDUM OF LAW AND DECLARATIONS IN SUPPORT
OF MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Exosome Diagnostics, Inc. seeks leave under Local Rule 7.2 to impound very limited portions of (1) its Complaint; and (2) its Memorandum of Law and the declarations of Johan Skog and Mario Morken in support of its Motion for a Preliminary Injunction.

Exosome has good cause for this request. Each of the materials for which Exosome seeks impoundment contain references to a business partner of Exosome’s with whom Exosome has entered into confidential and sensitive research and development. Revealing the identity of Exosome’s partner would reveal to a competitive industry the nature and progress of those research undertakings. This would reduce the value of the undertaking to both Exosome and Exosome’s partner. Exosome has narrowly tailored the portions to be impounded, replacing only the name of Exosome’s partner with “Partner A” in these documents.

Should the Court grant this request, Exosome will file these documents to the docket in redacted form and unredacted form (under seal). Exosome will transmit unredacted copies of these filings to the Court’s Chambers and to Defendants in this action.

Dated: December 3, 2018

Respectfully submitted,

EXOSOME DIAGNOSTICS, INC.

By Its Attorney,

/s/ Adam S. Gershenson

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 3rd day of December, 2018 the foregoing document, filed through the ECF system, will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Adam S. Gershenson

Adam S. Gershenson